

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-2(c)

In re:  
THADDUS ADAMS

Debtor

:  
:  
:  
:  
: Case No.: 22-18731  
:  
: Judge: Gravelle  
:  
: Chapter 13  
:  
:

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO**

☒ **CREDITOR'S MOTION or CERTIFICATION OF DEFAULT**

☐ **TRUSTEE'S MOTION OR CERTIFICATION OF DEFAULT**

The debtor in the above-captioned Chapter 13 proceeding hereby objects to the following (**choose one**):

1. ☒ Motion for Relief from Automatic Stay filed by Midfirst Bank, creditor.

A hearing has been scheduled for April 5, 2023 at 9:00 a.m.

**OR**

- ☐ Motion to Dismiss filed by the Standing Chapter 13 Trustee.

A hearing has been scheduled for , 2023, at 9:00 a.m.

**OR**

- ☐ Certification of Default filed by \_\_\_\_\_, creditor.

I am requesting that a hearing be scheduled on this matter.

**OR**

- ☐ Certification of Default filed by Standing Chapter 13 Trustee

I am requesting that a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons (**choose one**):

- ☐ Payments have been made in the amount of \$ \_\_\_\_\_, but have not been accounted for. Documentation in support is attached hereto
- ☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

x☐ Other (**explain your answer**): I was out of work due to a work injury through about December 2022. When I returned to work, my employer (the State of New Jersey) had begun an additional deduction labeled "Salary Recovery" for I believe was to pay back insurance and pension payments that were not being paid by me while I was out of work. My final payment for "Salary Recovery" was on my pay stub dated February 17, 2023, thus my pay stub dated March 3, 2023 no longer has that deduction, so my net pay is my normal amount.

That being said, beginning March 2023 I can begin getting back on track with my mortgage payments. So I propose to the mortgage company to rollover these missed mortgage payments for December, January, and February into the Chapter 13 Plan, and I will begin to make the regular payments beginning March 2023.

- 3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.
- 4. I certify under penalty of perjury that the foregoing is true and correct.

Date: \_\_\_\_\_

/s/ Thaddus Adams

Date: \_\_\_\_\_

/s/ \_\_\_\_\_

**NOTE:**

- 1. This form must be filed with the Court and served upon the standing Chapter 13 Trustee and creditor at least seven (7) days before the return date pursuant to D.N.J. LBR 9013-1(d), if filed in opposition to a *Motion for Relief from the Automatic Stay* or *Trustee's Motion to dismiss*.
- 2. This form must be filed with the Court and served upon the Standing Chapter 13 Trustee and creditor within fourteen (14) days of the filing of a *Creditor's Certification of Default* (under an *Order Resolving Motion to Vacate Stay and/or Dismiss with Conditions*) or a *Trustee's Certification of Default*.

**If this form is not filed, then the Motion or Certification of Default will be deemed uncontested and no hearing will be scheduled**